IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

PHOENIX ENTERTAINMENT PARTNERS, LLC, Plaintiff, v. RYCO ENTERPRISES, LLC d/b/a Leo's Pub & Grill and JASON CHRUCH d/b/a Music Works Entertainment, Defendant.	))))))))))))))	Case Number: 4:17-CV-1306 RLW

DEFENDANT JASON CHURCH'S
CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE COMPLAINT

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Civil L.R. 6-1, Defendant Jason Church, by undersigned counsel, respectfully requests and additional thirty (30) days, up to and including June 9, 2017, to respond to Plaintiff's Complaint [Doc # 1]. In support of his Motion, Defendant states as follows:

1. On April 13, 2017, Plaintiff filed its Complaint alleging, among other things, trademark infringement under 15 U.S.C. § 1114(1) and unfair competition under 15 U.S.C. § 1125(a).

2. Jason Church ("Defendant") was served on April 19, 2017. Defendant's response to the Complaint is due May 10, 2017.

3. Defendant requires an additional 30 days, up to and including June 9, 2017, to respond to the Complaint. Defendant—along with his recently-retained counsel—require such

time because the issues presented in the Complaint are complex and require additional time for investigation and analysis.

4. The parties also hope to discuss a possible resolution to this dispute. An extension of time will allow the parties to determine whether an early resolution of this dispute is possible.

5. Plaintiff consents to this request for additional time.

6. No party will be prejudiced if Defendant extends his deadline by thirty (30) days, up to and including June 9, 2017, to file a response to the Complaint.

WHEREFORE, Defendant Jason Church requests that this Court grant him an additional 30 days, up to and including June 9, 2017, or any other time the Court deems just and proper in which to respond to the Complaint.

Dated this 10th day of May, 2017.

Respectfully submitted,

THE BOROWIAK LAW FIRM, LLC

/s/Zachary J. Borowiak

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and accurate copy of the foregoing was served upon all counsel of record on this 10th day of May, 2017, via the Court's electronic filing system.

_/s/Zachary J. Borowiak____________